

UNITED STATES DISTRICT COURT

Southern District of New York

Case No.

PLAINTIFF:

Sara Martinez (Jane Doe 1), Whistleblower

DEFENDANTS:

1. KIPP NYC Public Charter Schools
2. KIPP Academy Charter School
3. KIPP Foundation
4. New York City Department of Education (NYCDOE)
5. New York State Education Department (NYSED)
6. PS 156 (Walter J. Damrosch School)
7. Illinois National Insurance Company (AIG Insurance)
8. AIG Claims, Inc.
9. David Levin (Co-founder of KIPP)
10. John Does 1-10 (Unknown individuals who may have been involved in misconduct, negligence, or defamation)
11. Jane Does 1-10 (Unknown individuals who may have been involved in misconduct, negligence, or defamation)

PLAINTIFF'S MOTION FOR PROTECTIVE ORDER FOR HERSELF AND HER FAMILY

INTRODUCTION

Plaintiff, Sara Martinez, respectfully moves this Court for a Protective Order on behalf of herself and her family, including but not limited to her mother, Valentina Pacheco, and other immediate

family members, to prevent ongoing harassment, surveillance, intimidation, and retaliation by Defendants or their affiliates.

Plaintiff is a known whistleblower who has been subjected to systematic harassment, intimidation, and surveillance following her legal actions against Defendants. These retaliatory actions place her and her family at immediate risk of harm and warrant urgent court intervention.

LEGAL STANDARD

Under Rule 26(c) of the Federal Rules of Civil Procedure, courts may issue protective orders to shield parties from “annoyance, embarrassment, oppression, or undue burden.” Furthermore, under whistleblower retaliation laws and constitutional protections, Plaintiff has a right to protection from harassment, retaliation, and unlawful surveillance.

FACTUAL BACKGROUND

1. Retaliation Following Settlement

- Plaintiff settled a legal case against KIPP NYC and related entities in 2019. Since then, she has been the subject of false and defamatory statements, isolating her from her community and professional networks.
- Witnesses have provided signed affidavits attesting to Defendants' defamatory actions against her.

2. Targeted Harassment and Intimidation

- Plaintiff has received multiple threats to her safety, including direct and indirect intimidation tactics linked to Defendants and their associates.
- Plaintiff's mother and family members have also experienced harassment connected to this case.

3. Surveillance and Privacy Violations

- Plaintiff has reason to believe that she is under illegal government and corporate surveillance linked to Defendants.
- This includes possible misuse of FISA surveillance tools and National Security Letters (NSLs) to monitor and suppress her legally protected activities.

REQUESTED RELIEF

Plaintiff respectfully requests that this Court:

1. Order Defendants and any affiliates to cease any direct or indirect harassment, surveillance, or intimidation against Plaintiff and her family.
2. Restrict Defendants from contacting or interfering with Plaintiff's mother, Valentina Pacheco, and other family members.
3. Grant Plaintiff temporary anonymity in all public records related to this case to prevent further exposure to harm.
4. Issue sanctions against Defendants should any further retaliatory actions occur.
5. Expedite this motion due to the ongoing and urgent nature of the threats.

CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that the Court grant this Protective Order to safeguard her and her family from further retaliation, harassment, and illegal surveillance.

Dated: 2/27/25

Respectfully Submitted,

Sara Martinez

saramarnco@gmail.com

346-796-7252